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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

PURDUE PHARMA L.P., *et al.*¹

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**VERIFIED STATEMENT OF THE AD HOC COMMITTEE ON
ACCOUNTABILITY PURSUANT TO RULE 2019 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

The Ad Hoc Committee on Accountability (the “**Ad Hoc Committee**”), by its undersigned counsel, submits this statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and respectfully states as follows:

1. Since February 2018, Michael S. Quinn of Eisenberg & Baum, LLP (“**E&B**”) has represented certain members of the Ad Hoc Committee regarding various issues unrelated to the Debtors.

¹ The debtors in these chapter 11 cases (“**Debtors**” or “**Purdue**”), along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014) (collectively, the “**Bankruptcy Cases**”).

2. On September 15, 2019 (the “**Filing Date**”), the Debtors filed the Bankruptcy Cases. Since the Filing Date, E&B has provided bankruptcy related advise to members of the Ad Hoc Committee.

3. In May 2020, E&B entered into retainer arrangements with the members of the Ad Hoc Committee for representation of the Committee in the Bankruptcy Cases.

4. As of the date hereof, E&B does not represent, nor purport to represent, any entities or individuals, other than the Ad Hoc Committee and members therein, in connection with the Bankruptcy Cases.

5. E&B does not represent the Ad Hoc Committee as a “committee” as such term is used in the 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”) and the Bankruptcy Rules and does not undertake to represent the interests of, or act as a fiduciary for, any creditor, party in interest or other entity that has not entered into a retention agreement with E&B.

6. In accordance with Bankruptcy Rule 2019, annexed hereto as **Exhibit “A”** is a list of the Ad Hoc Committee member names, addresses and the “nature and amount of all disclosable economic interests” held in respect of the Debtors as of the date hereof.

7. The information contained in Exhibit A is based on the information provided by the Ad Hoc Committee members and is intended only to comply with Rule 2019 and for no other purpose. E&B does not make any representation regarding the validity, amount, allowance or priority of such claims and reserves all rights with respect thereto.

8. Nothing contained in this Statement should be construed should be construed as a limitation upon, or a waiver of, any right of any member of the Ad Hoc Committee to assert, file or amend their claims in these Bankruptcy Cases.

9. E&B reserves the right to amend or supplement this Statement in accordance with
Bankruptcy Rule 2019.

Dated: May 28, 2020
New York, NY

Respectfully Submitted,

Eisenberg & Baum, LLP

By: /s/ Michael S. Quinn
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Counsel to Ad Hoc Committee on Accountability

Exhibit A
Ad Hoc Committee Members and their Economic Interests

MEMBER	ADDRESS	NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTEREST
Nan Goldin	278 Clinton Avenue Brooklyn, NY 11205	Unliquidated, unsecured claims on the basis of personal injury claims against the Debtors, compensatory and punitive damages.
Edward J Bisch	166 E Country Club Dr Westhampton, NJ 08060	Unliquidated, unsecured claims on the basis of wrongful death and loss of consortium claims against the Debtors, compensatory and punitive damages.
Emily Walden	10700 Tall Tree Court Louisville, KY 40241	Unliquidated, unsecured claims on the basis of wrongful death claims against the Debtors, compensatory and punitive damages.
Barbara Van Rooyan	8 Delphinus Irvine, CA 92603	Unliquidated, unsecured claims on the basis of wrongful death and loss of consortium claims against the Debtors, compensatory and punitive damages.
Cynthia Munger	31 Louella Court Wayne, PA 19087	Unliquidated, unsecured claims on the basis of personal injury claims against the Debtors, compensatory and punitive damages.